



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

400 Seventh St. S.W.
Washington, D.C. 20590

E1-1717
R2J

October 17, 2005

Ms. Rini Ghosh
Attorney-Adviser
Section of Environmental Analysis
Surface Transportation Board
1925 K Street, NW
Washington, DC 20423

FD 34284
received 10/24/05

Dear Ms. Ghosh:

This letter is a response to your e-mail of October 6, in which you requested confirmation of the information on potential safety and environmental issues posed by rail lines that cross pipeline rights-of-way that I provided to Ms. Jaya Zyman-Ponebshek of URS Corporation. We understand you are preparing a response to comments on a Draft Environmental Impact Statement (DEIS) for a proposed rail line in Medina County, Texas that would cross two gas pipelines.

On October 5, Ms. Zyman-Ponebshek provided me with her summary of our previous communications on this subject. This summary, which I edited as shown below, represents my views on the issues posed by the intersections of pipelines and railroads:

Mr. Richard Huriaux (Director, Technical Standards) of the U.S. DOT's Office of Pipeline Safety indicated that pipeline owners and operators are responsible for ensuring the safety of pipelines that are near or cross railroads. In other words, they are responsible for keeping pipelines safe and buried and capable of handling mechanical forces imposed on them. Railroads should be encouraged to work with the owners of the pipeline easements to ensure that both the railroad and any pipelines crossing or running along the right-of-way are built, operated, and maintained to maintain the safety of all facilities.

In general, railroads tend not to be a threat to pipeline integrity because railroads ride on top of their own structures and their load is distributed over a large area. Additionally, vibration from trains is not a problem for a properly designed pipeline. In the past, pipeline owners were often

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required by the railroad operator to install 'casings' to carry the gas or hazardous liquid pipeline under the railroad structure. Casings, however, are not required by the pipeline safety regulations. In fact, casings may contribute to corrosion of the pipeline if they are filled with water or are electrically shorted. In any case, casings are not required by the Federal pipeline safety regulations and are not generally necessary for the protection of the pipeline from the forces imposed by the railroad.

You may want to consult with the pipeline division of the Texas Railroad Commission, which is responsible for enforcing the Federal and state pipeline safety regulations in that state.

If you have any further questions about the pipeline safety regulations, please contact me at 202-366-4565 or by e-mail at richard.huriaux@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Huriaux", with a stylized flourish at the end.

Richard D. Huriaux, P.E.
Director, Technical Standards
Office of Pipeline Safety